

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Kevin McNulty  
v. : Crim. No. 15-576  
KEILA RAVELO : ORDER FOR CONTINUANCE

This matter having come before the Court on the application of defendant Keila Ravelo (Lawrence S. Lustberg, Esq., and Steven H. Sadow, Esq., appearing) in the presence of Paul J. Fishman, United States Attorney for the District of New Jersey (by Brian Urbano and Andrew Kogan, Assistant U.S. Attorneys, appearing), for an order continuing to designate the above-captioned case as “complex” for the purposes of computing and excluding time pursuant to Title 18, United States Code, Section 3161(h)(7)(A), (h)(7)(B)(ii), and (h)(7)(B)(iv); the defendant, through counsel, having requested and consented to the entry of this Order; the defendant, through counsel, having stated that she is still in the process of obtaining documents necessary to the preparation of her defense; defense counsel having stated during the status conference held on December 22, 2016, that, due to the need to obtain the above-referenced documents, trial schedules, as well as the additional issues stated on the record, they need additional time to effectively prepare to file motions and proceed to trial; and the defendant being aware that absent such an Order she would have the right to brought to trial within 70 days of her appearance before a Judicial Officer in this District in connection with this matter or the filing of an Indictment, whichever date last occurred, pursuant to Title 18,

United States Code, Section 3161(c)(1); and the charges being the result of a lengthy investigation and the defendant needing additional time to review discovery, which includes, among other things, thousands of documents, with associated meta data, and to investigate the charges and file motions in this case, motions that may require prolonged hearings, and to effectively prepare for the filing of motions and trial; and the parties having concurred on the record that this matter is complex as defined in the Speedy Trial Act of 1974, and the Court having found that an Order granting a continuance of the proceedings in the above-captioned matter should be entered, and for good and sufficient cause shown,

IT IS THE FINDING OF THIS COURT that this action should be continued for the reasons known to the Court and/or set forth on the record during the December 22, 2016 status conference, including the following reasons:

1. This case involves the allegation of wire fraud and conspiracy to commit wire fraud, which charges are more fully set forth in an Indictment, Criminal No. 15-576.
2. The Indictment is the result of a long term investigation.
3. Discovery in this matter is voluminous, including of thousands of documents with associated meta data.
4. The parties anticipate that motion practice in this matter may be complex and lengthy.
5. The defendant requires additional time to review discovery, to

investigate the charges, to obtain documents and to develop possible defenses to the charges. It is further anticipated that once counsel has had an opportunity to review the evidence, the defendant may file pre-trial motions.

6. Based upon representations made by defense counsel, including representations made concerning voluminous discovery that must be reviewed, the need to obtain additional documents, counsel's trial schedule, and the complexity of issues in this matter, it is unreasonable to expect defense counsel to be able to adequately prepare for pretrial and trial proceedings as currently set by the Court.

7. In light of these findings, and given the nature of the prosecution, and its complexity, it is unreasonable to expect adequate preparation for pretrial proceedings or the trial itself within the time limits established under the Speedy Trial Act of 1974.

8. The grant of a continuance will enable counsel for the defendant to adequately review the discovery, prepare motions, and proceed with trial.

9. The Court finds that the defendant has entered into a knowing, voluntary, and intelligent waiver of her rights under the Speedy Trial Act of 1974.

10. Pursuant to Title 18, United States Code, Section 3161(h)(7), the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial.

WHEREFORE, it is on this 27<sup>th</sup> day of December 2016


ORDERED that this matter continues to be designated to be a complex case pursuant to Title 18, United States Code, Section 3161(h)(7)(A), (h)(7)(B)(ii) and (h)(7)(B)(iv); and it is further

ORDERED that trial in this matter shall commence on September 13, 2017 at 9:00 a.m.; and it is further

ORDERED that the Court shall hold a status conference in this matter on March 14, 2017 at 10:00 a.m.; and it is further

ORDERED that the period between this Order and September 13, 2017, shall be excluded in computing time under the Speedy Trial Act of 1974 pursuant to the provisions of Title 18, United States Code, Section 3161(h)(7)(A); and it is further

ORDERED that all provisions of the Court's Order for Discovery and Inspection not superseded by this Order shall remain in full force and effect.

  
HON. KEVIN MCNULTY  
United States District Judge